



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

February 10, 2011

By ECF

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (S-6)(BMC)

Dear Counsel:

The government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

In or about and between May 2009 and January 2011, a cooperating witness ("CW-7"), who was an associate of the Colombo family and may be called as a witness in the above-captioned case, consensually recorded meetings with associates of the defendants.¹ The following consensually-recorded conversations

¹ Although the government does not intend to introduce Exhibits 1038 to 1240 in its case-in-chief at trial, the exhibits contain references by criminal associates of the defendants to the defendants, the defendants' positions in the Colombo family

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made by CW-7 will be available at DupeCoop shortly after the date of this letter. You may obtain these materials by contacting John Palermo at (973) 895-1359.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1038	Consensual recording made on 5/14/09
1039	Consensual recording made on 5/19/09
1040	Consensual recording made on 5/20/09
1041	Consensual recording made on 5/28/09
1042	Consensual recording made on 6/02/09
1043	Consensual recording made on 6/05/09
1044	Consensual recording made on 6/08/09
1045	Consensual recording made on 6/12/09
1046	Consensual recording made on 6/18/09
1047	Consensual recording made on 6/19/09
1048	Consensual recording made on 6/20/09
1049	Consensual recording made on 6/24/09
1050	Consensual recording made on 6/26/09
1051	Consensual recording made on 7/01/09
1052	Consensual recording made on 7/06/09
1053	Consensual recording made on 7/07/09
1054	Consensual recording made on 7/08/09
1055	Consensual recording made on 7/10/09
1056	Consensual recording made on 7/13/09
1057	Consensual recording made on 7/14/09
1058	Consensual recording made on 7/15/09
1059	Consensual recording made on 7/16/09

and crimes committed by the defendants.

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1060	Consensual recording made on 7/17/09
1061	Consensual recording made on 7/22/09
1062	Consensual recording made on 7/24/09
1063	Consensual recording made on 7/27/09
1064	Consensual recording made on 7/29/09
1065	Consensual recording made on 7/29/09
1066	Consensual recording made on 7/31/09
1067	Consensual recording made on 8/03/09
1068	Consensual recording made on 8/07/09
1069	Consensual recording made on 8/08/09
1070	Consensual recording made on 8/10/09
1071	Consensual recording made on 8/12/09
1072	Consensual recording made on 8/13/09
1073	Consensual recording made on 8/17/09
1074	Consensual recording made on 8/18/09
1075	Consensual recording made on 8/19/09
1076	Consensual recording made on 8/20/09
1077	Consensual recording made on 8/22/09
1078	Consensual recording made on 8/24/09
1079	Consensual recording made on 8/25/09
1080	Consensual recording made on 8/26/09
1081	Consensual recording made on 8/28/09
1082	Consensual recording made on 8/31/09
1083	Consensual recording made on 9/01/09
1084	Consensual recording made on 9/02/09
1085	Consensual recording made on 9/03/09
1086	Consensual recording made on 9/09/09

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1087	Consensual recording made on 9/10/09
1088	Consensual recording made on 9/11/09
1089	Consensual recording made on 9/14/09
1090	Consensual recording made on 9/14/09
1091	Consensual recording made on 9/17/09
1092	Consensual recording made on 9/18/09
1093	Consensual recording made on 9/18/09
1094	Consensual recording made on 9/19/09
1095	Consensual recording made on 9/21/09
1096	Consensual recording made on 9/25/09
1097	Consensual recording made on 9/28/09
1098	Consensual recording made on 10/01/09
1099	Consensual recording made on 10/06/09
1100	Consensual recording made on 10/08/09
1101	Consensual recording made on 10/09/09
1102	Consensual recording made on 10/11/09
1103	Consensual recording made on 10/16/09
1104	Consensual recording made on 10/20/09
1105	Consensual recording made on 10/23/09
1106	Consensual recording made on 10/29/09
1107	Consensual recording made on 10/30/09
1108	Consensual recording made on 11/04/09
1109	Consensual recording made on 11/06/09
1110	Consensual recording made on 11/10/09
1111	Consensual recording made on 11/13/09
1112	Consensual recording made on 11/19/09
1113	Consensual recording made on 11/23/09

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1114	Consensual recording made on 11/25/09
1115	Consensual recording made on 11/27/09
1116	Consensual recording made on 11/30/09
1117	Consensual recording made on 12/04/09
1118	Consensual recording made on 12/05/09
1119	Consensual recording made on 12/07/09
1120	Consensual recording made on 12/07/09
1121	Consensual recording made on 12/11/09
1122	Consensual recording made on 12/18/09
1123	Consensual recording made on 12/21/09
1124	Consensual recording made on 12/31/09
1125	Consensual recording made on 1/04/10
1126	Consensual recording made on 1/07/10
1127	Consensual recording made on 1/08/10
1128	Consensual recording made on 1/16/10
1129	Consensual recording made on 1/21/10
1130	Consensual recording made on 1/21/10
1131	Consensual recording made on 1/22/10
1132	Consensual recording made on 1/28/10
1133	Consensual recording made on 1/31/10
1134	Consensual recording made on 2/05/10
1135	Consensual recording made on 2/09/10
1136	Consensual recording made on 2/12/10
1137	Consensual recording made on 2/16/10
1138	Consensual recording made on 2/19/10
1139	Consensual recording made on 2/22/10
1140	Consensual recording made on 3/01/10

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1141	Consensual recording made on 3/05/10
1142	Consensual recording made on 3/09/10
1143	Consensual recording made on 3/12/10
1144	Consensual recording made on 3/12/10
1145	Consensual recording made on 3/16/10
1146	Consensual recording made on 3/19/10
1147	Consensual recording made on 3/23/10
1148	Consensual recording made on 3/25/10
1149	Consensual recording made on 3/31/10
1150	Consensual recording made on 4/02/10
1151	Consensual recording made on 4/05/10
1152	Consensual recording made on 4/07/10
1153	Consensual recording made on 4/10/10
1154	Consensual recording made on 4/16/10
1155	Consensual recording made on 4/21/10
1156	Consensual recording made on 4/23/10
1157	Consensual recording made on 4/26/10
1158	Consensual recording made on 4/27/10
1159	Consensual recording made on 4/29/10
1160	Consensual recording made on 5/03/10
1161	Consensual recording made on 5/05/10
1162	Consensual recording made on 5/11/10
1163	Consensual recording made on 5/12/10
1164	Consensual recording made on 5/14/10
1165	Consensual recording made on 5/19/10
1166	Consensual recording made on 5/21/10
1167	Consensual recording made on 5/24/10

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1168	Consensual recording made on 5/27/10
1169	Consensual recording made on 6/01/10
1170	Consensual recording made on 6/04/10
1171	Consensual recording made on 6/07/10
1172	Consensual recording made on 6/09/10
1173	Consensual recording made on 6/12/10
1174	Consensual recording made on 6/15/10
1175	Consensual recording made on 6/22/10
1176	Consensual recording made on 6/23/10
1177	Consensual recording made on 6/25/10
1178	Consensual recording made on 6/29/10
1179	Consensual recording made on 7/01/10
1180	Consensual recording made on 7/05/10
1181	Consensual recording made on 7/07/10
1182	Consensual recording made on 7/08/10
1183	Consensual recording made on 7/12/10
1184	Consensual recording made on 7/16/10
1185	Consensual recording made on 7/16/10
1186	Consensual recording made on 7/20/10
1187	Consensual recording made on 7/21/10
1188	Consensual recording made on 7/22/10
1189	Consensual recording made on 7/26/10
1190	Consensual recording made on 7/31/10
1191	Consensual recording made on 8/05/10
1192	Consensual recording made on 8/06/10
1193	Consensual recording made on 8/12/10
1194	Consensual recording made on 8/13/10

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1195	Consensual recording made on 8/19/10
1196	Consensual recording made on 8/21/10
1197	Consensual recording made on 8/24/10
1198	Consensual recording made on 8/27/10
1199	Consensual recording made on 9/01/10
1200	Consensual recording made on 9/03/10
1201	Consensual recording made on 9/08/10
1202	Consensual recording made on 9/13/10
1203	Consensual recording made on 9/11/10
1204	Consensual recording made on 9/22/10
1205	Consensual recording made on 9/21/10
1206	Consensual recording made on 9/23/10
1207	Consensual recording made on 9/29/10
1208	Consensual recording made on 10/01/10
1209	Consensual recording made on 10/07/10
1210	Consensual recording made on 10/08/10
1211	Consensual recording made on 10/13/10
1212	Consensual recording made on 10/14/10
1213	Consensual recording made on 10/21/10
1214	Consensual recording made on 10/23/10
1215	Consensual recording made on 10/26/10
1216	Consensual recording made on 10/27/10
1217	Consensual recording made on 10/29/10
1218	Consensual recording made on 11/01/10
1219	Consensual recording made on 11/09/10
1220	Consensual recording made on 11/11/10
1221	Consensual recording made on 11/12/10

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1222	Consensual recording made on 11/13/10
1223	Consensual recording made on 11/22/10
1224	Consensual recording made on 11/22/10
1225	Consensual recording made on 11/28/10
1226	Consensual recording made on 11/29/10
1227	Consensual recording made on 12/01/10
1228	Consensual recording made on 12/03/10
1229	Consensual recording made on 12/05/10
1230	Consensual recording made on 12/06/10
1231	Consensual recording made on 12/09/10
1232	Consensual recording made on 12/14/10
1233	Consensual recording made on 12/15/10
1204	Consensual recording made on 12/20/10
1235	Consensual recording made on 12/22/10
1236	Consensual recording made on 12/29/10
1237	Consensual recording made on 1/02/11
1238	Consensual recording made on 1/04/11
1239	Consensual recording made on 1/07/11
1240	Consensual recording made on 1/14/11

If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: /s/Elizabeth A. Geddes
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: Clerk of the Court (BMC) (by ECF)